IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

Bluefield Division

SHARON FAYE BAKER and CHASTITY CASSADY, on behalf of themselves and all others similarly situated,

Plaintiff,

MAY 1 2002

SAMUEL L KAY, CLL
District & Banks

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Civil Action No.: 1:01-0553

PURDUE PHARMA L.P., a Delaware corporation; THE PURDUE FREDERICK COMPANY, a Delaware corporation; PURDUE PHARMACEUTICALS L.P., a Delaware corporation; THE P.F. LABORATORIES, INC., a New Jersey corporation; PRA HOLDINGS, INC., a New York corporation; ABBOTT LABORATORIES, an Illinois corporation; ABBOTT LABORATORIES INC., a Delaware corporation, BRADSHAW PHARMACY, a West Virginia corporation, and JOHN DOES,

Defendants

AFFIDAVIT of KIMBERLY E. WILLIAMS

I, the undersigned, do affirm and attest that the following statements are true and accurate:

- 1. My name is Kimberly E. Williams;
- 2. I am an attorney at the law firm of Hunt & Serreno;
- 3. On April 1, 2002, I contacted Ramonda Lyons, an attorney with Dinsmore & Shohl, requesting a stipulation of voluntary dismissal signed by all the parties in the action.
- On the 2nd of April, 2002, Ramonda Lyons telephoned stating that the Purdue entities would not agree to a dismissal.

- 5. As the plaintiffs did not wish to eliminate their ability to become members of a potential future class, I informed Ms. Lyons that I would file a Motion to Dismiss Without Prejudice upon return from my honeymoon on April 15, 2002.
- 6. During the time I was away on my honeymoon, Purdue's Motion to Deny Class Certification was filed. I assumed was solely completed for billing hour purposes, given Dinsmore & Shohl's notice of plaintiffs' desire for a voluntary dismissal.
- 7. Upon return from my honeymoon, I filed Plaintiff's Motion to Dismiss Without Prejudice.
- 8. Thereafter, Dinsmore & Shohl's ascribed improper motive to the filing of plaintiffs' Motion to Dismiss.
- 9. Dinsmore & Shohl, by counsel, Ramonda Lyons, were advised of the ongoing problem concerning plaintiffs' failure to comply with discovery which is more particularly set forth in Deanna Westfall's affidavit.

AND FURTHER THE AFFIANT SAITH NOT.

Kimberly E. Williams, Esquire

Hunt & Serreno

900 Lee St., Ste. 1000

Charleston, West Virginia 25301

(304) 346-8809

Taken, subscribed and sworn before me this 30th day of April, 2002.

My Commission expires:

03-03-09

OFFICIAL SEAL
NOTARY PUBLIC, STATE OF WEST VIRGINIA
BRIDGET ALENA MELTON
24 BRADFORD STUDET
APARTMENT OF CHARLESTON, WV 25301
My Commission Expires March 3, 2009

Notary Public V. MULTON